

April 18, 2025

Hon. Brooke Rollins, Secretary of Agriculture
1400 Independence Avenue SW
Washington, DC 20250

Jessica Bowron, Acting Director
U.S. National Forest Service
1849 C Street NW
Washington, DC 20240

Holly Jewkes Supervisor, Bend-Fort Rock Ranger District
63095 Deschutes Market Road
Bend, OR 97701

Dear Secretary Rollins, Director Bowron and Supervisor Jewkes,

Attached is the Complaint for Injunction/Temporary Restraining Order we filed today with U.S. District Court in Eugene, OR, together with Exhibits submitted as part of our Complaint.

We are seeking a delay of the hard closure date of May 1, 2025 of the area within the Cabin Butte Vegetation Project in the Deschutes National Forest to permit persons living there to relocate over the course of the summer and early Fall.

As you will see from our Complaint, we believe the Environmental Assessment conducted by the Forest Service for the Cabin Butte project failed to meet NEPA requirements by not taking into account the impact the project will have on the human environment, both within and without the project area. Additionally, 80 individuals living within the project area have filed Disability Discrimination Complaints that have not been processed.

As relief, we are asking that the Court order the Forest Service to reopen and redo the environmental documentation and halt the project until a legally sufficient EA has been done.

However, we are willing to forego our Complaint, drop the lawsuit and withdraw the 80 disability complaints if USDA and the Forest Service is willing to agree to a "rolling closure" over the course of the summer and early Fall while the weather is good to allow all those remaining on the land to relocate.

Sincerely,



Charles W. Hemingway,
On behalf of Plaintiffs